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10 Attorneys for Defendant
11 Mr. Wilson

12
13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE EASTERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,) Case No. 2:21-cr-155-JAM
16 Plaintiff,)
17 vs.) **STIPULATION AND ORDER TO CONTINUE**
18 JOSHUA WILSON and) **STATUS CONFERENCE AND EXCLUDE TIME**
19 CODY CRAMER,)
20 Defendants.)
21 Date: October 19, 2021
22 Time: 9:30 a.m.
23 Judge: Hon. John A. Mendez

24 IT IS HEREBY STIPULATED and agreed by and between Acting United States
25 Attorney Phillip A. Talbert, through Assistant United States Attorney James R. Conolly, counsel
26 for Plaintiff; Federal Defender Heather Williams, through Assistant Federal Defender Hootan
27 Baigmoammadi, counsel for Defendant Joshua Wilson; and Kyle Knapp, counsel for Cody
28 Cramer that the status hearing currently set for October 19, 2021 at 9:30 be continued to
December 14, 2021 at 9:30 a.m.

The parties specifically stipulate as follows:

1. By previous order, this matter was set for a status on October 19, 2021 at 9:30
a.m.
2. By stipulation, Mr. Wilson now moves to continue the status conference to
December 14, 2021 at 9:30 a.m.
3. The government has represented to counsel for Mr. Wilson that it anticipates

1 discovering approximately thirty pages of reports, seven video recordings, and
2 twenty photographs in the next ten days or so. The Caldor Fire has caused delays
3 in the production of discovery to the defense.

4 4. Mr. Wilson requires additional time to review the discovery, investigate and
5 research possible defenses, research potential pretrial motions, and explore
6 potential resolutions to the case, and otherwise prepare for trial.

7 5. Mr. Wilson believes that failure to grant the requested continuance would deny
8 him the reasonable time necessary for effective preparation, taking into account
9 the exercise of due diligence.

10 6. Neither the government nor Mr. Cramer object to the continuance.

11 7. Therefore, the parties stipulate that the ends of justice served by granting the
12 continuance outweighs the best interest of the public, Mr. Wilson, and Mr.
13 Cramer in a speedy trial, and request the Court so to find.

14 8. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial
15 Act), the parties request that the time period between October 19, 2021 and
16 December 14, 2021, inclusive, be deemed excludable pursuant to 18 U.S.C. §
17 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance
18 granted by the Court at the defense's request, based on a finding that the ends of
19 justice served by granting the continuance outweighs the best interest of the
20 public, Mr. Wilson, and Mr. Cramer in a speedy trial.

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2 Respectfully submitted,
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4 HEATHER E. WILLIAMS
Federal Defender

5 Date: October 15, 2021
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/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Mr. Wilson

8 Date: October 15, 2021
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/s/ Kyle R. Knapp
Kyle R. Knapp
Attorney for Mr. Cramer

11 Date: October 15, 2021
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PHILLIP A. TALBERT
Acting United States Attorney

/s/ James R. Conolly
James R. Conolly
Assistant United States Attorney
Attorneys for Plaintiff

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ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Date: October 15, 2021

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE